

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:12cr223
)	
HAMADA MAKARITA,)	
)	
Defendant.)	

GOVERNMENT'S NOTICE OF INTENT TO USE EVIDENCE

PLEASE TAKE NOTICE that the United States shall present the following evidence, notwithstanding that the government submits that the evidence is intrinsic to the charged conduct. To the extent that it is deemed evidence of other crimes, wrongs, or acts, extrinsic to the charged conduct, notice of such evidence is given pursuant to Federal Rule of Evidence 404(b), as evidence to prove the defendant's plan, intent, knowledge, and/or absence of mistake with respect to the charged conduct.

First, the government intends to present testimony or other evidence that the defendant attempted to deposit checks written to others, including his children, into his own bank account.

Second, the government intends to present evidence of health care fraud committed by the defendant with regard to his treatment of his parents, Ragaa and Afaf Makharita, including but not limited to evidence of upcoding and billing multiple times for the same procedure.

Third, the government intends to present evidence of health care fraud committed by the defendant with regard to his treatment of Reem Hammoud, including but not limited to evidence of upcoding and billing multiple times for the same procedure.

Fourth, the government intends to present evidence of prescriptions written, or narcotics otherwise dispensed, outside the bounds of dental or medical practice, and without a legitimate

dental or medical purpose, to other patients, specifically Scott Barbaro, Thomas Vanblairicom, Ian Williams, and Vida Alimi-Tokhi.

Respectfully submitted,

NEIL H. MacBRIDE
UNITED STATES ATTORNEY

By: _____/s/_____
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CERTIFICATE OF SERVICE

I certify that on October 28, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the defendant's counsel.

By: _____/s_____
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